

# EXHIBIT C

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

ANGELITA BAILEY,

\*

*On Her Own Behalf and on Behalf of \* Civil Action No. \_\_\_\_\_  
All Others Similarly Situated,*

Plaintiff,

v.

\* [Removed from the Circuit Court for  
Montgomery County, Maryland  
\* Case No. C-15-CV-23-000224]

MERCURY FINANCIAL, LLC,

\*

Defendant.

\*

\* \* \* \* \*

**DECLARATION OF MERCURY FINANCIAL, LLC**

1. I, Janet Gigeous, am over the age of eighteen, have personal knowledge of the facts set forth herein, and am otherwise competent to testify.

2. I am employed by Mercury Financial, LLC (“Mercury”), and I am an authorized representative of Mercury for the purposes of providing this Declaration.

3. Mercury is a Limited Liability Company organized and existing under the laws of the State of Delaware, with its principal place of business in the State of Delaware.

4. Mercury services and markets credit cards as its principal business. Mercury maintains records of, among other things, all financial activity related to each borrower’s account it services, subject to its document retention policies and procedures. These records are maintained and updated on a regular basis, and the financial activity for each account is captured and entered by a person with knowledge or from information transmitted by a person with knowledge. It is the regular practice of Mercury to make and keep this information.

5. I have access to this information as required, and I am fully familiar with the manner in which it is created and maintained for each account.

6. As of the time of removal of this matter, Mercury has determined the following to be true based upon a review of its aforementioned business records:

- a. As of February 22, 2023, Maryland borrowers with accounts being serviced by Mercury totaled approximately 32,000 accounts.
- b. As of February 22, 2023, Maryland borrowers with accounts being serviced by Mercury had account balances totaling approximately \$59,000,000 in the aggregate.

7. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on March 24, 2023



Name: Janet Gigeous  
Title: Head of Customer Operations